

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF JESSICA BANSAL IN
SUPPORT OF PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION TO ADD
CLASS COUNSEL**

Assigned to: Hon. Trina L Thompson

Complaint Filed: July 7, 2025

Additional Counsel for Plaintiffs

1 Jessica Karp Bansal (SBN 277347)
2 jessica@ndlon.org
3 Lauren Michel Wilfong (Admitted *Pro Hac Vice*)
4 lwilfong@ndlon.org
5 NATIONAL DAY LABORER ORGANIZING NETWORK
6 1030 S. Arroyo Parkway, Suite 106
7 Pasadena, CA 91105
8 Telephone: (626) 214-5689

7 Eva L. Bitrán (SBN 302081)
8 ebitran@aclusocal.org
9 Diana Sánchez
10 dianasanchez@aclusocal.org
11 ACLU FOUNDATION
12 OF SOUTHERN CALIFORNIA
13 1313 West 8th Street
14 Los Angeles, CA 90017
15 Telephone: (213) 977-5236

13 Erik Crew (Admitted *Pro Hac Vice*)
14 ecrew@haitianbridge.org
15 HAITIAN BRIDGE ALLIANCE
16 4560 Alvarado Canyon Road, Suite 1H
17 San Diego, CA 92120
18 Telephone: (949) 603-7411

DECLARATION OF JESSICA KARP BANSAL

I, Jessica Karp Bansal, declare as follows:

1. I am an attorney at law duly licensed and entitled to practice in the State of California. I am an attorney with the National Day Laborer Organizing Network and counsel of record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently thereto.

2. On October 10, 2025, I emailed counsel for Defendants in this action to request their position on Plaintiffs' Administrative Motion to add Lauren Michel Wilfong as class co-counsel.

3. Counsel for Defendants responded that they do not oppose Plaintiffs' Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10, 2025, in Claremont, California.

/s/ Jessica Karp Bansal

Jessica Karp Bansal